

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

-----	:	Civil Action No. 3:16-md-2738-FLW-
IN RE: JOHNSON & JOHNSON	:	LHG
TALCUM POWDER PRODUCTS	:	
MARKETING, SALES PRACTICES	:	
AND PRODUCTS LIABILITY	:	MDL No. 2738
LITIGATION	:	
	:	
	:	
	:	
This Document Relates to: All	:	
Plaintiffs	:	
	:	
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CROSS-NOTICE OF CONTINUING ORAL AND VIDEOTAPED
DEPOSITION OF JOHN C. O'SHAUGHNESSY

PLEASE TAKE NOTICE that, in connection with *Vickie Forrest v. Johnson & Johnson, et al.*, Case No. 1522-CC00419-02, in the Circuit Court of the City of St. Louis, State of Missouri, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. ("Johnson & Johnson Defendants"), pursuant to the Federal and Missouri Rules of Civil Procedure, cross-notice the videotaped (remote) deposition upon oral examination of **John C. O'Shaughnessy**, before a person duly authorized to administer oaths, on **Tuesday, June 29, 2021, at 10:00 a.m.** at **Crowne Plaza Princeton, 900 Scudders Mill Road, Plainsboro, New Jersey 08536** and also conducted **remotely via Zoom video conference services** as agreed upon by all parties, pursuant to the *Plaintiff's Notice of Videotaped*

(Remote) Deposition of John C. O'Shaughnessy, as served and attached as Exhibit

"A" hereto.

The deposition will be conducted pursuant to the provisions of the Federal and Missouri Rules of Civil Procedure.

Dated: June 23, 2021

s/ Susan M. Sharko

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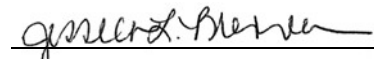
CERTIFICATION OF SERVICE

I hereby certify that I have, on this 23rd day of June, 2021, caused the foregoing Cross-Notice of Oral and Videotaped Deposition of John C. O'Shaughnessy be served on all counsel of record via ECF, including:

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Jessica L. Brennan

EXHIBIT A

**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI**

VICKIE FORREST, et al.,

Plaintiffs,

vs.

JOHNSON & JOHNSON, et al.,

Defendants

Case No. 1522-CC00419-02

Division 1

**NOTICE OF VIDEOTAPED
(REMOTE) DEPOSITION OF JOHN C. O'SHAUGHNESSY**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Rule 57 of the Missouri Rules of Civil Procedure, Plaintiffs, by their undersigned attorneys, shall take the videotaped deposition of **John C. O'Shaughnessy**, in the above-referenced matter. The deposition which shall be taken by videotape and stenographic means before a certified court reporter or other person authorized to administer oaths on **Tuesday, June 29, 2021, at 10 a.m. EST at Crowne Plaza Princeton, 900 Scudders Mill Road, Plainsboro, New Jersey 08536**. The deposition will also be conducted remotely via Zoom video conference services as agreed upon by all parties. The deposition will continue from day to day until completed. The deposition will be facilitated by Golkow Reporting. All persons wishing to attend the deposition remotely shall provide counsel for Plaintiffs with their email addresses no later than four days before the deposition.

The witness is required to bring/produce true, correct and complete copies of all documents as referred to in **Schedule A** below, no later than five (5) business days prior to the deposition.

SCHEDULE "A"
Subpoena Duces Tecum

The deponent shall make the following documents and things available for the purposes of inspection and copying:

DEFINITIONS:

The term "document(s)" means and refers to all forms of writings and records, and includes any reduction to tangible form, including computer or magnetic memory or storage, or any other electronically stored information, communication, or data, including any written, recorded, or filmed graphic matter of any kind or nature, however produced or reproduced, including originals, drafts, and non-identical copies, wherever located including, but not limited to, documents and records held or stored on hospital servers, databases, networks, shared networks, local and remote drives, and local and remote drives of individuals.

DOCUMENTS REQUESTED:

1. A copy of the witness's current or most recent resume or curriculum vitae;
2. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the presence of asbestos in talcum powder products;
3. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the presence of asbestos in Johnson's Baby Powder;
4. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between talcum powder products and ovarian cancer;
5. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between Johnson's Baby Powder and ovarian cancer;
6. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between asbestos and ovarian cancer;
7. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the International Agency for Research on Cancer's (IARC) consideration of talc as a human carcinogen;

8. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee after the witness left employment with Johnson and Johnson;
9. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee, after the witness left employment with Johnson and Johnson, regarding talcum powder products;
10. Any and all documents in the witness's possession, custody, or control which reflect communications with any Johnson and Johnson entity or employee, including its lawyers, regarding talcum powder products;
11. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with Susan Nicholson, MD after the witness left employment with Johnson and Johnson;
12. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with John Hopkins, PhD after the witness left employment with Johnson and Johnson;
13. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with the Food and Drug Administration (FDA) regarding talcum powder products;
14. Any and all documents in the witness's possession, custody, or control which reflect communications specifically with Rich Zazenski regarding talcum powder or talcum powder products; and
15. Any and all documents in the witness's possession, custody, or control which refer or relate to, in any way, the following specific individuals or entities regarding talcum powder products:
 - a. Imerys or any of its predecessor companies or entities;
 - b. Rio Tinto or any of its predecessor companies or entities;
 - c. Luzinac Group or any of its predecessor companies or entities;
 - d. Crowell & Morning LLP, including Ridgway M. Hall Jr.;
 - e. Robert Glenn;
 - f. Meta-Analysis Research Group;
 - g. Joshua Muscat, MD;

- h. Michael Huncharek; MD; and
- i. Brooke Mossman, PhD.

Dated: June 21, 2021

Respectfully submitted,

ONDERLAW, LLC

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Certificate of Service

The undersigned hereby certifies that this document was filed and electronically served by way of the Court's electronic filing system on this 21st day of June, 2021.

/s/ W. Wylie Blair